



*GEORGETOWN UNIVERSITY LAW CENTER*  
***INSTITUTE FOR PUBLIC REPRESENTATION***

Hope M. Babcock  
Angela J. Campbell  
David C. Vladeck  
Directors  
James A. Bachtell  
Michael D. Beach  
Sheila A. Bedi  
Lisa Goldman  
Amy R. Wolverson  
Staff Attorneys

600 New Jersey Avenue, NW, Suite 312  
Washington, DC 20001-2075  
Telephone: 202-662-9535  
TDD: 202-662-9538  
Fax: 202-662-9634

May 28, 2003

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W., TW-A325  
Washington, D.C. 20554

Re: **In the Matter of 2002 Biennial Regulatory Review – Review of the  
Commission’s Broadcast Ownership Rules and Other Rules Adopted  
Pursuant to Section 202 of the Telecommunications Act of 1996, MB Docket  
No. 02-277**

Dear Ms. Dortch:

Pursuant to Section 1.1206(b) of the Commission’s Rules, Children Now wishes to submit into the record a recently completed study pertaining to the above-referenced proceeding. The study, Big Media, Little Kids: Media Consolidation & Children’s Television Programming, finds that the availability and diversity of children’s television programming is decreasing as the media marketplace becomes increasingly consolidated.

As Children Now noted in its comments, the Commission failed to address in the NPRM the impact that the relaxation of ownership rules will have on children. Since none of the FCC-commissioned studies considered the consequences of media consolidation on children, Children Now conducted an in-depth analysis of consolidation and its effect on children’s programming.

The research found that media consolidation is a serious threat to meeting the public interest obligations to children. Specifically, the study found that consolidation in Los Angeles has decreased the number of children’s series by 47% and the number of hours of children’s programming by more than 50%. Most of this decline occurred on stations that are part of media duopolies. The study also found that the number of hours each week that children’s programming can be found on the air has decreased by almost one-third since 1998. Furthermore, children’s programs in 2003 were nearly four times as likely to be repurposed than in 1998.

While Children Now urges the Commission to retain the current media ownership rules to preserve the amount of children’s programming that remains, it recognizes that the Commission is voting on revisions to the ownership rules June 2, 2003. Therefore, in light of this research showing that changes to current ownership policies will have a serious impact on children’s programming, Children Now recommends that the Commission, at a minimum, should 1)

prohibit duopoly stations from sharing children's programming; 2) require a minimum amount of original programming; and 3) conduct further research on the impact of media consolidation on children. These recommendations will help ensure that broadcasters better meet their public interest obligations to children as the Commission considers altering the current ownership restrictions.

Pursuant to the Commission's Rules, this submission is being filed electronically through the Commission's Electronic Comment Filing System procedures. Please do not hesitate to contact me at 202-662-9543 should you have any questions regarding this filing.

Sincerely,

James A. Bachtell

Attachment

cc: Patti Miller (Children Now)  
Angela Campbell (IPR)